



CITY OF TUCSON
HOUSING & COMMUNITY DEVELOPMENT DEPARTMENT
ADMINISTRATION DIVISION

City of Tucson Responses to concerns raised regarding the Section 106 Process as it relates to the Downtown Motor Apartments application for federal HOME funds.

- The square footage of the proposed apartments is greater than average in Tucson and does not equate to warehousing people, shoe-boxing, or higher density than Pima County jail.
- The project's parking plan has been approved by Planning & Development Services.
- The City cannot answer as to what HUD has read.
- The developer completed all notification requirements for a project outside of a Historic Preservation Zone.
- The Barrio Historico Historic District Advisory Board's vote is taken into consideration as public comment as each Historic District Advisory Board's function is limited to activities within its historic district. This project lies outside of Barrio Historico's historic district.
- A Section 106 Process is only necessary if federal funds are being used in a project; activity can occur prior to the consideration or application for federal funds.
- The developer has made modifications to the design setting back the front elevation so it no longer hangs over the remaining front buildings.
- Questions regarding the Unified Development Code should be addressed with the Planning and Development Services Department.
- Architects often have differing opinions
- The teleconference call with HUD on 10/15/14 was a technical assistance session which is not a public meeting.
- The property is in the Armory Park Historic District but is not in a Historic Preservation Zone (HPZ) and therefore HPZ rules do not apply.
- The City cannot answer to the developers' choice of property.
- The July 2014 Memorandum of Agreement between the Arizona State Historic Preservation Office and the developer is not applicable to the developers' application for the HOME Investment Partnership funding loan from the City.
- The City cannot answer to the opinions of the developer's attorney.
- The City cannot answer to the opinions of the AZ SHPO.
- The City received requests from multiple individuals requesting to be "consulting parties;" those individuals will be added to the email list for information and their comments will be considered and responded to as part of the interested "public."



- As of 12/24/14 the following have been identified as “Consulting Parties:”
 - The Arizona State Historic Preservation Office – as required by regulation
 - The Tucson Historic Preservation Foundation – as the largest private organization preserving and celebrating the distinctive and irreplaceable historic resources of Tucson, Pima County and Southern Arizona.
 - The Tucson Pima County Historical Commission, Plans Review Subcommittee – as a representative of local government and participating organization in Programmatic Agreement between the City of Tucson, the Arizona State Historic Preservation Office, and the Advisory Council on Historic Preservation.
 - The Armory Park Historic Zone Advisory Board-although the subject property is not in the Armory Park Historic Preservation Zone it is in the Armory Park Historic District.
 - The Armory Park Neighborhood Association-as the neighborhood association in which the subject property is located.

